

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Cr. No. 20-20117-MSN
	)	
JAIME WALSH,	)	
	)	
Defendant.	)	

---

**UNITED STATES' POSITION REGARDING  
DRAFT PRESENTENCE INVESTIGATION REPORT**

---

The United States of America, through the undersigned counsel, files its Position Regarding the Draft Presentence Investigation Report in this case, and respectfully submits the following:

1. On March 2, 2021, the Defendant pled guilty to count eight of the eight-count indictment in this case. RE-26, Order on Change of Plea. Count eight charged the defendant with bank fraud in violation of 18 U.S.C. § 1344. RE-1, Indictment. The Defendant entered his guilty plea pursuant to a written plea agreement. RE-25, Plea Agreement. Under the terms of that plea agreement, the United States agreed to recommend the low end of the advisory guideline range, as determined by the court, and five years of supervised release. *Id.*

2. The United States has reviewed the Draft Presentence Investigation Report ("Draft PSR") in this case, dated May 5, 2021. RE-28, Draft PSR. The United States has no objections to the facts or guideline computations in the Draft PSR.

3. The United States will make a final sentencing recommendation in accordance with ¶ 2 of the Plea Agreement in this case and the factors outlined in 18 U.S.C. § 3553(a).

4. The United States submits the foregoing after consulting by phone with defense counsel and by email with the United States Probation Office.

Respectfully submitted,

JOSEPH C. MURPHY, JR.  
ACTING UNITED STATES ATTORNEY

s/ Scott P. Smith  
Scott P. Smith  
Assistant U.S. Attorney  
167 N. Main, Suite 800  
Memphis, Tennessee 38103  
Telephone: (901) 544-4231

**CERTIFICATE OF SERVICE**

I, Scott P. Smith, Assistant United States Attorney for the Western District of Tennessee, hereby certify that the foregoing document was filed via the court's electronic filing system (ECF), on this date: May 24, 2021.

s/ Scott P. Smith  
Scott P. Smith  
Assistant United States Attorney